

1 CLARK GAREN, CALIFORNIA STATE BAR #50564  
2 RACHEL ZWERNEMANN, CALIFORNIA STATE BAR #286515  
3 SALARIED EMPLOYEES OF PCC  
4 6700 SOUTH CENTINELA,  
5 THIRD FLOOR,  
6 CULVER CITY, CALIFORNIA 90230  
7 TELEPHONE: (310) 636-1001  
8 FAX: (310) 636-4771

9 ATTORNEYS FOR DEFENDANT PCC

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IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

WESTERN WORLD INSURANCE  
COMPANY,

Plaintiff,

v.

PROFESSIONAL COLLECTION  
CONSULTANTS,

Defendant.

CASE NO. 2:15-cv-02342 MWF (VBKx)

RESPONSES TO WESTERN WORLD  
INSURANCE COMPANY'S  
REQUEST FOR PRODUCTION TO  
PROFESSIONAL COLLECTION  
CONSULTANTS, SET NO. ONE

Complaint Filed: 3/30/15

PROPOUNDING PARTY: WESTERN WORLD INSURANCE COMPANY  
RESPONDING PARTY: PROFESSIONAL COLLECTION CONSULTANTS  
SET NUMBER: ONE (1)

TO ALL PARTIES HEREIN AND TO THEIR RESPECTIVE ATTORNEYS  
OF RECORD:

Pursuant to Federal Rules of Civil Procedure 34, Plaintiff and Counter-Claim  
Defendant Western World Insurance Company ("Western World") hereby makes the  
following requests of Defendant and Counter-Claimant Professional Collection  
Consultants ("PCC"):

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RESPONSES TO Western World's Request for Production to Professional  
Collection Consultants, Set One CASE NO. 2:15-cv-02342 MWF (VBKx)



1 deliver the documents to a professional copy shop in Culver City, California to have  
2 copies made and delivered to Plaintiff at Plaintiff's sole expense.

3 Subpoena to testify before Grand Jury dated May 22, 2015. In response to this  
4 Subpoena, PCC provided approximately 30,000 documents. However, PCC objects to  
5 producing these documents because of the expense (the initial copying cost  
6 approximately \$5,000.00) and because these documents do not contain any relevant or  
7 admissible evidence or any evidence that is likely to lead to the discovery of relevant  
8 or admissible evidence. PCC is willing to permit inspection of these approximately  
9 30,000.00 documents at its place of business and permit Plaintiff to copy at no charge  
10 up to 500 pages. PCC is also willing to deliver the documents to a professional copy  
11 shop in Culver City, California to have copies made and delivered to Plaintiff at  
12 Plaintiff's sole expense.

13 PCC objects to the production of "All other writing, e-mails, correspondence,  
14 reports, warrants, or tangible materials of any type pertaining to any Action taken  
15 against PCC by the Federal Bureau of Investigation in 2013, 2014, or 2015 because all  
16 documents not already produced that are described by this request are communications  
17 between clients and their attorneys and are therefore privileged and cannot and will not  
18 be disclosed in response to this Request for Production of Documents. PCC is unable  
19 to provide a specific list of these documents because the documents are not kept  
20 together in any place where they may be retrieved for description, and PCC is not  
21 certain that the documents are kept or retained at all.

22 REQUEST FOR PRODUCTION OF DOCUMENTS NO. 2:

23 All DOCUMENTS, writings, e-mails, correspondence, reports, warrants or  
24 tangible materials of any type pertaining to any action taken against PCC (including  
25 any interview, inspection, search or audit of PCC personnel or documents) by the  
26 United States Department of Justice in 2013 or 2014.

27 Objection. PCC cannot ascertain the meanings of the words "any type of  
28 Action taken against PCC. Without waiving this objection, PCC will produce copies of

1 Dated: November 14, 2015

LAW OFFICES OF CLARK GAREN

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3 BY

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5 CLARK GAREN,  
6 ATTORNEY FOR DEFENDANT AND  
7 CROSS-COMPLAINANT PCC  
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